

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

**IN RE: STEEL ANTITRUST  
LITIGATION**

Case No. 08-cv-5214

**THIS DOCUMENT RELATES TO  
ALL DIRECT PURCHASER ACTIONS:**

Honorable James B. Zagel

*Standard Iron Works v. ArcelorMittal, et al.,*  
Case No. 08-cv-5214

*Wilmington Steel Processing Co., Inc. v.*  
*ArcelorMittal, et al.,* Case No. 08-cv-5371

*Capow, Inc. d/b/a Eastern States Steel v.*  
*ArcelorMittal, et al.,* Case No. 08-cv-5633

*Alco Industries, Inc. v. ArcelorMittal, et al.,*  
Case No. 08-cv-6197

*Gulf Stream Builders Supply, Inc. v.*  
*ArcelorMittal, et al.,* Case No. 10-cv-4236

**PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL  
OF SETTLEMENTS WITH NUCOR CORPORATION,  
STEEL DYNAMICS, INC. AND SSAB SWEDISH STEEL CORPORATION,  
CONDITIONAL CERTIFICATION OF A SETTLEMENT CLASS,  
AND AUTHORIZATION FOR DISSEMINATION OF NOTICE**

Pursuant to Federal Rules of Civil Procedure 23(a), 23(b)(3) and 23(e), Plaintiffs respectfully move this Court to:

1. Grant preliminary approval to the proposed settlements with Nucor Corporation, Steel Dynamics, Inc. and SSAB Swedish Steel Corporation;
2. Conditionally certify for settlement purposes the proposed Settlement Class;
3. Conditionally appoint Named Plaintiffs as Class Representatives, and appoint Fine,

Kaplan and Black, RPC, and Kellogg, Huber, Hansen, Todd, Evans & Figel, P.L.L.C. as Co-Lead Class Counsel;

4. Approve the form and manner of giving notice of the proposed settlements to the Class; and

5. Set a date for a hearing on final approval of the settlements.

Plaintiffs have submitted a [Proposed] Preliminary Approval Order which is consistent with the relief requested herein.

Dated: October 17, 2016

Respectfully submitted,

/s/ Jeffrey S. Istvan

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*Co-Lead Counsel for Plaintiffs and the Proposed Class*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 17th day of October, 2016, I caused a true and correct copy of the foregoing **Plaintiffs' Motion for Preliminary Approval of Settlements with Nucor Corporation, Steel Dynamics, Inc. and SSAB Swedish Steel Corporation, Conditional Certification of a Settlement Class, and Authorization for Dissemination of Notice** to be filed and served electronically via the Court's CM/ECF system upon all registered users.

/s/ Jeffrey S. Istvan

Jeffrey S. Istvan